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November 25, 2019

VIA ECF

Hon. Lorna G. Schofield U.S. District Court for the Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square Courtroom 1106 New York, NY 10007 USDC SDNY
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Re: Delacruz v. Nike, Inc. - Civil Action No. 1:19-cv-10292-LGS

Dear Judge Schofield:

This firm represents Defendant Nike, Inc. ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Emanuel Delacruz ("Plaintiff"), to respectfully <u>request a thirty (30) day extension of time for Defendant to respond to the Complaint, up to and including January 2, 2020.</u> This letter is the first request for an extension of this deadline.

By way of background, Plaintiff commenced this action on or about November 5, 2019. (ECF No. 1.) Plaintiff served the Summons and Complaint on November 12, 2019, and Defendant's responsive pleading is due on December 3, 2019. (ECF No. 6.)

Upon being engaged to represent Defendant, the undersigned communicated with Plaintiff's counsel to request an extension of Defendant's time to respond to the Complaint. Plaintiff has agreed to extend this deadline to January 2, 2020. The reason for this request is to allow time for Defendant to investigate the allegations in the Complaint.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this request will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.

Respectfully submitted,

SEYFARTH SHAW LLP

Application GRANTED. Defendant shall respond to the Complaint

by January 2, 2020.

<u>/s/ John W. Egan</u> John W. Egan Dated: November 26, 2019 New York, New York

United States District Judge